

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

STAG WILLIAMSPORT, LLC,

Plaintiff,

v.

BHN ASSOCIATES, LLC, &
FIRST AMERICAN TITLE INSURANCE
COMPANY,
and *in rem* against
CERTAIN FUNDS HELD IN ESCROW BY THE
BOSTON OFFICE OF FIRST AMERICAN
TITLE INSURANCE COMPANY
Defendants.

Civil Action No.
1:21-cv-11958-NMG

**PLAINTIFF STAG WILLIAMSPORT, LLC'S REQUEST FOR LEAVE
TO FILE A SUR-REPLY IN OPPOSITION TO BHN ASSOCIATES, LLC'S
MOTION TO DISMISS OR TRAFER VENUE**

Pursuant to Local Rule 7.1(b)(3) of the Local Rules for the United States District Court for the District of Massachusetts, Plaintiff STAG Williamsport, LLC ("STAG" or "Plaintiff"), hereby requests leave to file a brief Sur-Reply, which will not exceed 7 pages, to be filed on or before January 19, 2022, to the Reply filed by Defendant BHN Associates, LLC ("BHN") in support of its Motion to Dismiss for Lack of Personal Jurisdiction or to Transfer Venue.

Good cause is shown by the request, because although BHN acknowledged the issue of *in rem* jurisdiction in its removal papers (Doc. 1, p.3 fn. 1), it failed to address the issue in its original motion filing. Consequently, BHN subsequently sought, and was granted leave, to file a Reply addressing this issue. Accordingly, STAG requests the opportunity to briefly respond to arguments raised in the BHN's Reply, which should have otherwise been raised in its original motion.

Respectfully submitted,

STAG WILLIAMSPORT, LLC

By its attorneys,

/s/ Benjamin M. Greene
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Date: January 14, 2022

CERTIFICATE OF SERVICE

I, Benjamin M. Greene, hereby certify that on this 14th day of January, 2022, I caused a copy of the within document to be filed and served on all counsel of record via the electronic filing system for the U.S. District Court, District of Massachusetts.

/s/ Benjamin M. Greene
Benjamin M. Greene

CERTIFICATE OF CONFERENCE

I, Benjamin M. Greene, hereby certify that on this 14th day of January, 2022, I sought consent from BHN to file this request, which BHN stated it would not provide.

/s/ Benjamin M. Greene
Benjamin M. Greene